

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2009-220-C

Joint Application of Frontier Communications Corporation, Frontier Communications of the Carolinas, LLC, (f/k/a New Communications of the Carolinas, Incorporated), Frontier Communications Online and Long Distance, Incorporated (f/k/a/New Communications Online and Long Distance, Incorporated), Verizon South, Incorporated, Verizon Long Distance, LLC and Verizon Enterprise Solutions, LLC for Approval of the Sale of Assets and the Transfer of Authority and Certificates

**MOTION FOR CONFIDENTIAL
TREATMENT OF CUSTOMER
INFORMATION**

Frontier Communications of the Carolinas, LLC “Frontier” or “Company”), by counsel, and pursuant to S.C. Code Ann. §§ 30-4-40 and S.C. Code Ann. Regs.103-804(S)(2), hereby files this Motion for Protective Treatment (“Motion”) in the above-captioned proceeding. Frontier seeks protective treatment by the South Carolina Public Service Commission (“Commission”) of certain confidential customer information attached under seal as Exhibit A.

The confidential information consists of trouble reports maintained by Frontier pursuant to Regulation 103-653 and furnished as directed by the Commission in Order No. 2019-755. These trouble reports contain the names, addresses, telephone numbers, and service-related information of Frontier’s customers which must be kept confidential under Section 222 of the Telecommunications Act of 1996 and 47 CFR 64.2001 *et seq.* The submitted information is appropriately exempted from public disclosure by the South Carolina Freedom of Information Act

as a trade secret which is defined to include “paid subscriber information” (Section 30-4-40(a)(1)); information of a personal nature, the disclosure of which would constitute an unreasonable invasion of personal privacy (Section 30-4-40(a)(2)); and information specifically exempted from disclosure by statute or law (Section 30-4-40(a)(5))

WHEREFORE, Frontier respectfully requests that the information contained in Exhibit A to this motion be ruled exempt from public disclosure and provided confidential treatment in accordance with S.C. Code Ann. § 39-8-10, *et seq.*

Respectfully submitted,

s/ Charles L.A. Terreni

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Columbia, South Carolina

EXHIBIT A
(Trouble Reports)

Filed Under Seal